

Seiplier v. Cundiff, et al.
Case No. 08 CV 50257

Exhibit C

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January 18, 2011

**VIA ELECTRONIC MAIL & FACSIMILE**

Mr. Blake Horwitz  
The Blake Horwitz Law Firm  
Two First National Plaza  
20 South Clark Street, Suite 500  
Chicago, Illinois 60603

RE: *Seiplier v. Cundiff, et al.*  
Case No. 08 C 50257  
Our File No. 2061

Dear Mr. Horwitz:

I am in receipt of your email correspondence requesting me to provide dates for the "witnesses that are outstanding."

First, attached please find Defendants' notice of deposition for the following individuals: Plaintiff, Milliman, Tim Matteson, and Cynthia Matteson.

Second, I have already sent you numerous correspondence regarding the remaining depositions, but in the interest of cooperation, here is a list of the deponents within my control and their availability:

1. Captain Cundiff (3 hours): any time before February 10; must take place at my office or in McHenry County
2. Kathleen Seith (1.5 hours): any time; must take place in McHenry County
3. Jan Weech (30 min.): any time; must take place in McHenry County
4. Tutt (1 hour): January 25, 26, 31
5. Dr. Meyer (1 hour): he requested we provided him with dates and requires an additional \$500.00

Mr. Blake Horwitz

January 18, 2011

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You may notice those depositions within the time frames listed above. Defense counsel will be available for depositions any day before February 15.

Finally, I have also attached Defendants' Second Set of Interrogatories and Requests for Admission to Plaintiff.

As always, if you would like to discuss any of these issues further, please feel free to contact me or Jim Sotos.

Very truly yours,

JAMES G. SOTOS & ASSOCIATES, LTD.

A handwritten signature in black ink, appearing to read "Elizabeth K. Barton", with a large, stylized flourish extending to the right.

Elizabeth K. Barton

Enclosures

EKB/cak